## UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA Criminal No. 18-mj-752 (JTH)

UNITED STATES OF AMERICA,

Plaintiff,

UNDER SEAL

v.

CHRISTOPHER MORALES,

MOTION OF UNITED STATES FOR DETENTION WITHOUT BAIL PENDING TRIAL

Defendant.

The United States of America, by and through its attorneys, Erica H. MacDonald, United States Attorney for the District of Minnesota, and Katharine T. Buzicky, Assistant United States Attorney, hereby moves for the detention of the defendant without bail pending trial on the following grounds:

- 1. The above-named defendant is charged with production of child pornography in violation of Title 18, United States Code, Sections 2251(a) and (e).
- 2. Under Title 18, United States Code, Section 3142(f)(1)(E) the defendant is charged with a crime of violence because it is an offense involving a minor victim.
- 3. Under Title 18, United States Code, Section 3142(e)(3)(E), there is a rebuttable presumption in favor of detention for this offense.
- 4. Under Title 18, United States Code, Section 3142(F) there is no condition or combination of conditions of release in Title 18, United States Code, Section 3142(c), which will reasonably assure the safety of the community, and the appearance of the defendant as required.

SCANNED

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U.S. DISTRICT COURT ST. PAUL

5. The United States also respectfully requests a three-day continuance of the detention hearing, pursuant to Title 18, United States Code, Section 3142(f).

Dated: September 4, 2018

Respectfully Submitted,

ERICA H. MacDONALD United States Attorney

s/ Katharine T. Buzicky

BY: KATHARINE T. BUZICKY Assistant U.S. Attorney Attorney ID No. 671031